

FILED

AUG 26 2025

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY 
DEPUTY CLERK

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

MARK ANTHONY ORTEGA,	§	
Plaintiff,	§	
	§	
v.	§	Civil Action No. 5:25-cv-00792-FB
	§	
SENIOR LIFE INSURANCE COMPANY,	§	
CAROLINE GALATI,	§	
DAVID CARTER, and	§	
ETHAN ERICH SMITH,	§	
Defendants.	§	

DEFENDANT ETHAN ERICH SMITH'S ORIGINAL ANSWER

Defendant Ethan Erich Smith, appearing pro se, files this Original Answer to Plaintiff's Complaint, and would respectfully show the Court as follows:

I. GENERAL DENIAL

Pursuant to Rule 8(b)(3) of the Federal Rules of Civil Procedure, Defendant generally denies each and every allegation contained in Plaintiff's Complaint and demands strict proof thereof.

II. AFFIRMATIVE DEFENSES

Without waiving the general denial, Defendant asserts the following defenses:

- a. Plaintiff's claims are barred in whole or in part by the Telephone Consumer Protection Act, 47 U.S.C. § 227 et seq., and related FCC regulations.

- b. Plaintiff fails to state a claim upon which relief can be granted.

c. Defendant reserves the right to assert additional defenses that may become applicable as discovery progresses or further proceedings develop.

III. PRAYER

Defendant respectfully prays that Plaintiff take nothing by this action, that judgment be entered in Defendant's favor, and for such other and further relief, at law or in equity, to which Defendant may be justly entitled.

Respectfully submitted,



Ethan Erich Smith
1818 Westgate Drive
Fort Wayne, IN 46804
Phone: 260-442-4864
Email: ethansmith.insurance@gmail.com

Pro Se Defendant

CERTIFICATE OF SERVICE

I hereby certify that on the 25th day of August, 2025, a true and correct copy of the foregoing Defendant Ethan Erich Smith's Original Answer was served upon Plaintiff Mark Anthony Ortega by depositing it in the United States Mail, first-class postage prepaid, addressed as follows:

Mark Anthony Ortega
152 Bedingfield Dr,
San Antonio, TX 78270



Ethan Erich Smith

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